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July 14, 2022

(Via ECF)

The Honorable Michael A. Hammer, U.S.M.J.
District Court of New Jersey
Martin Luther King Building & U.S. Court House
50 Walnut Street
Newark, NJ 07102

Re: Ledesma v. City of Paterson, et. al.
Docket No.: 2:21-CV-15143-KM-MAH
Our File No.: 82-0016

Dear Judge Hammer:

As Your Honor may recall, my office represents the Defendants in the above. I write to update the Court on the parties' continued meet-and-confer efforts. In short, we have agreed that Plaintiff will answer an additional 10 interrogatories, without subparts. The undersigned asked that, in return, the parties forego any time limit on depositions – defendants included. Plaintiff's counsel has essentially refused this compromise, saying that he would allow an additional 30-45 minutes of deposition past the 7-hour rule if he decided it was necessary.

My adversary's stance regarding interrogatories was that the answers sought could be obtained at deposition. Based on that, I am willing to play along, which is why I agreed to his proposal. However, if I cannot cover all of the allegations at deposition, discovery in this case will have been stymied and the undersigned left unable to assess the validity of Plaintiff's claims and/or mount a viable defense. This is not a slip and fall case, but a complex litigation with allegations of whistleblower retaliation and civil rights violations, with a Complaint numbering 233 paragraphs and 12 counts. While I sincerely hope that Plaintiff's deposition can be accomplished in a day or day and a half, and have no intention or desire to extend proceedings any more than necessary, I do not wish to have discovery stall while Your Honor addresses an unnecessary discovery dispute. The undersigned therefore submits that there is good cause to relax the time limitation on depositions set forth under the court rules.

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As always, I appreciate Your Honor's time, understanding and consideration and look forward to speaking with the Court on Tuesday. Should there be any questions in the interim, please do not hesitate to contact me at Your convenience.

Respectfully submitted,

By: 

John F. Gillick, Esq.

JFG/me

cc: Jamison M. Mark, Esq. (*via ECF*)